

Green, LindaE

---

From: Jorja Rose <jorjarose@bennington.edu>  
Sent: Thursday, February 02, 2017 12:32 PM  
To: FOIA HQ  
Subject: Re: Public Records Request

Hello Mike,

The address to use is:

Jorja Rose  
3552 Rock Church Creek Road Northwest  
Washington, D.C. 20010

Thank you again for all your help on this.

Jorja

On Thu, Jan 5, 2017 at 10:21 AM, Jorja Rose <jorjarose@bennington.edu> wrote:

## FOIA REQUEST

### Fee benefit requested

Dear FOIA Officer:

Pursuant to the federal Freedom of Information Act, 5 U.S.C. § 552, I request documents and exhibits introduced by the EPA as evidence during the complainant's initial prehearing exchange in the matter of E.I. Dupont de Nemours and Company (docket numbers TSCA-HQ-2004-0016, RCRA-HQ-2004-0016, and TSCA-HQ-2005). My request is for all of the exhibits relating to DuPont's understanding of substantial risk. A list of those exhibits can be found here:

<https://www.epa.gov/sites/production/files/2016-05/documents/dupont-prehearingexchange.pdf>

I would also like copies of the following respondent depositions. For your convenience, I have included the exhibit numbers listed in the document I linked to above.

- 113 – Transcript of the videotaped deposition of Bruce W. Karrh, M.D., dated April 15, 2004, in the matter of Jack W. Leach, et al. v. E.I. DuPont De Nemours & Company (80 pp.)
- 114 – Deposition of Gerald Kennedy, Volume I and Index (339 pp.)
- 115 – Exhibits 1-24 to the deposition of Gerald Kennedy, dated July 31, 2002.
- 116 – Deposition and exhibits of Gerald Kennedy, dated August 1, 2002. Volume II, attached exhibits 25-84
- 118 – Transcript of videotaped deposition of Glenn R. Evers, dated April 30, 2004 (267 pp.)
- 119 – Deposition of Paul Bossert, dated January 16, 2001 (94 pp.)
- 122 – Deposition of Andrew Gallagher, dated May 17, 2004, and attachments as exhibits (54 pp.)
- 123 – Deposition of Judy Walrath, Ph.D., dated June 24, 2004. In the matter of Leach v. DuPont (100 pp.)
- 150 – DVD of the videotaped deposition of Glenn Evers, dated April 30, 2004, Part 1 of 3

I would like to receive the information in the form of digital PDFs if possible, except for exhibit 150, which I would like to receive in the form of a DVD or digital video file.

As a representative of the news media I am only required to pay for the direct cost of duplication after the first 100 pages. As research assistant to Mariah Blake, an investigative journalist working on a book for Crown that is intended to educate the public on government operations, I request a fee waiver.

I would appreciate your communicating with me by email or telephone, rather than by mail.

I look forward to your determination regarding my request within 20 business days, as the statute requires.

Thank you for your assistance.

Sincerely,

Jorja Rose  
Research Assistant to Mariah Blake  
3552 Rock Creek Church Rd. Northwest  
Washington, D.C. 20010  
(405) 326-4033